

DAVID N. BARRY, ESQ. (SBN 219230)
ANNA H. GALAVIZ, ESQ. (SBN 293651)
THE BARRY LAW FIRM
11845 W. Olympic Blvd., Suite 1270
Los Angeles, CA 90064
Telephone: 310.684.5859
Facsimile: 310.862.4539

Attorneys for Plaintiff, GILBERTO PEREZ

H. PAUL EFSTRATIS (SBN 242373)
LEWIS BRISBOIS BISGAARD & SMITH LLP
45 Fremont Street, Suite 3000
San Francisco, California 94105
Telephone: 415.262.8592
Facsimile: 415.434.0882

Attorneys for Defendant FORD MOTOR COMPANY

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GILBERTO PEREZ, an individual,

Plaintiff,

v.

FORD MOTOR COMPANY, A Delaware
Corporation; and DOES 1 through 20, inclusive,
Defendants.

Case No. 2:22-cv-01380-DJC-DB

(Removed from Sacramento County – Case
No. 34-2022-00322216)

**STIPULATION FOR EXTENSION OF
TIME TO FILE DISPOSITIONAL
DOCUMENTS; ORDER**

**Action Filed: June 21, 2022
Trial Date: None**

District Judge: Hon. Daniel J. Calabretta

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Plaintiff Gilberto Perez and Defendant Ford Motor Company (the “Parties”) filed a Joint Notice of Settlement on December 2, 2022. [ECF 6.] Since filing of the Joint Notice of Settlement, the Parties have cooperated in completing the settlement terms. However, pursuant to the terms of the Parties’ settlement and despite the Parties due diligence, the Parties require a brief extension of time, through May 15, 2023, to complete the outstanding term of the settlement and to file dispositional documentation in this matter.

It is so stipulated.

Dated: April 20, 2023

THE BARRY LAW FIRM

By: 

David N. Barry
Anna H. Galaviz
Attorneys for Plaintiff,
GILBERTO PEREZ

Dated: April 20, 2023

**LEWIS BRISBOIS BISGAARD & SMITH
LLP**

By: 

H. Paul Efstratis
Attorney for Defendant,
FORD MOTOR COMPANY

ORDER

Pursuant to Local Rule 160(b), the Court may extend the time for filing dispositional papers for good cause shown. *See Sprague v. Fin. Credit Network, Inc.*, 2018 WL 4616688, at *4 (E.D. Cal. Sept. 25, 2018) (“[Good cause] requires the party to show that despite due diligence the scheduled deadline could not be met.”). Based upon the Parties’ efforts to complete their settlement terms and the Parties’ Stipulation to the amended deadline, the Court finds that the Parties’ request is warranted.

Accordingly, IT IS HEREBY ORDERED that the Parties shall file appropriate papers to dismiss this action in its entirety no later than May 15, 2023.

IT IS SO ORDERED.

Dated: April 20, 2023

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE